

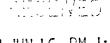
Control Number: 52067



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SOAH DOCKET NO. 473-21-2424 PUC DOCKET NO. 52067



APPLICATION OF ENTERGY TEXAS,
INC. TO ADJUST ITS ENERGY
EFFICIENCY COST RECOVERY
FACTOR AND REQUEST TO ESTABLISH
REVISED COST CAPS

\$

2021 JUN 16 PM 1: 31
BEFORE THE STATE OFFICE
FIGURE OFFICE
OF

ADMINISTRATIVE HEARINGS

RESPONSE OF ENTERGY TEXAS, INC. TO CITIES FIRST REQUEST FOR INFORMATION: CITIES 1: 1 THROUGH 15

Entergy Texas, Inc. ("Entergy Texas" or "the Company") files its Response to Cities First Request for Information. The response to such request is attached and is numbered as in the request. An additional copy is available for inspection at the Company's office in Austin, Texas.

Entergy Texas believes the foregoing response is correct and complete as of the time of the response, but the Company will supplement, correct or complete the response if it becomes aware that the response is no longer true and complete, and the circumstance is such that failure to amend the answer is in substance misleading. The parties may treat this response as if it were filed under oath.

Respectfully submitted,

Miguel Suazo Senior Counsel ENTERGY SERVICES, LLC 919 Congress Avenue, Suite 701 Austin, Texas 78701 (512) 487-3961 telephone (512) 487-3958 facsimile

Attachments: CITIES 1:1 THROUGH 15

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Entergy Texas, Inc. to Cities First Request for Information has been sent by either hand delivery, electronic delivery, facsimile, overnight delivery, or U.S. Mail to the party that initiated this request in this docket on this the 16th day of June 2021.

Miguel Suazo
Miguel Suazo

Response of: Entergy Texas, Inc. to the First Set of Data Requests of Requesting Party: CITIES

Prepared By: Mark Delavan Sponsoring Witness: John K. Carson Beginning Sequence No. TH6

Ending Sequence No. TH6

Question No.: CITIES 1-1

Part No.:

Addendum:

Question:

Refer to the Direct Testimony of John K. Carson at 15-16. Regarding ETI's planned retail marketplace website, please explain how the establishment of this website is cost effective compared to how ETI has historically offered discounted energy efficient measures and fixtures to its residential customers.

Response:

By providing an online marketplace for residential customers, the Company will be able to provide energy efficiency products that are not currently included in either the Residential SOP or Residential Solutions MTR program. Once implemented, these products will include an incentive discount that lowers the price for a selected product compared to the same purchase at retail.

Additionally, an online marketplace will enable ETI to better serve rural areas by providing rural customers with online access to these programs. Some of the customers in the rural areas of the Company's service territory are challenged to participate in the Residential SOP program because presently, participation requires these customers to travel a significant distance to a retail store to purchase energy efficiency products. The online marketplace will allow these customers to purchase equipment and have it shipped to their home, which will facilitate participation in ETI's energy efficiency programs.

52067 TH6 002

Response of: Entergy Texas, Inc. to the First Set of Data Requests of Requesting Party: CITIES

Prepared By: Mark Delavan Sponsoring Witness: John K. Carson Beginning Sequence No. TH38 Ending Sequence No. TH38

Question No.: CITIES 1-2

Part No.:

Addendum:

Question:

Refer to the Direct Testimony of John K. Carson at 25-26. Please provide the source of the avoided cost of energy used in ETI's calculation of its performance bonus.

Response:

In accordance with 16 Tex. Admin. Code § 25.181(d)(3), ETI used the avoided cost of energy established in Project No. 38578, *Energy Efficiency Implementation Project under 16 TAC § 25.181(q)*, Avoided Cost of Capacity and Energy for the 2021 Program Year (Nov. 4, 2020).

TH38 003

Response of: Entergy Texas, Inc. to the First Set of Data Requests of Requesting Party: CITIES

Prepared By: Counsel Sponsoring Witness: N/A

Beginning Sequence No. TH39 Ending Sequence No. TH39

Question No.: CITIES 1-3

Part No.:

Addendum:

Question:

Please provide the avoided cost of capacity and avoided cost of energy in Midcontinent Independent System Operator (MISO) Zone 9 (Entergy) in 2020.

Response:

ETI has filed an objection to this request.

Response of: Entergy Texas, Inc. to the First Set of Data Requests of Requesting Party: CITIES

Prepared By: John K. Carson Sponsoring Witness: John K. Carson Beginning Sequence No. TH40 Ending Sequence No. TH40

Question No.: CITIES 1-4

Part No.:

Addendum:

Question:

Refer to the Direct Testimony of John K. Carson at 29. Please confirm that load management payments were not made to program participants that refused to curtail or reduced their curtailment amount. Please explain if ETI has made any changes to its Load Management SOP as a result of its experience in 2020.

Response:

Confirmed. ETI has not made any changes to its Load Management SOP.

TH40 005

Response of: Entergy Texas, Inc. to the First Set of Data Requests of Requesting Party: CITIES

Prepared By: Mark Delavan Sponsoring Witness: John K. Carson Beginning Sequence No. TH41

Ending Sequence No.

TH43

Question No.: CITIES 1-5

Part No.:

Addendum:

Ouestion:

Refer to the Direct Testimony of John K. Carson, Exhibit JKC-1, page 7. Regarding the Commercial Solutions MTP, please provide the program incentives paid and reported demand and energy savings realized in 2019 and 2020 for each of the following components of the program:

- Commercial Solutions a.
- b. **SCORE**
- City Smart c.
- d. Prescriptive and custom measures
- Midstream point-of-sale lighting. e.

Response:

The Commercial Solutions MTP program is a large program that works with many different types of ETI customers. The Commercial Solutions MTP program encompasses all of the Company's commercial energy efficiency programs. The program names for SCORE and CitySmart have been absorbed into the Commercial Solutions MTP program, and the customer types that were previously grouped under these program names still participate in energy efficiency as part of the Commercial Solutions MTP program. For purposes of this response, the Commercial Solutions MTP program's savings and incentives are broken out by the following customer type:

- Commercial Solutions is the summed savings and incentives for all participating commercial and non-profit customers (excluding schools and governments).
- SCORE is the summed savings and incentives for all participating school districts and colleges.
- CitySmart is the summed savings and incentives for all participating city, county, and state governments.

52067 **TH41** 006 Question No.: CITIES 1-5

2019 Commercial Solutions MTP by Customer Type					
Program	am Demand Savings Energy Savings Incentive Paid				
Commercial Solutions	3,509.97	16,918,754	\$766,065.35		
SCORE	596.77	3,965,877	\$106,358.14		
CitySmart	1,356.95	10,502,748	\$342,873.31		
Total	5,463.69	31,387,379	\$1,215,296.80		
2020 Comme	2020 Commercial Solutions MTP by Customer Type				
Program	Demand Savings	Energy Savings	Incentive Paid		
Commercial Solutions	3,725.55	19,233,343	\$850,219.21		
SCORE	1,820.04	8,952,686	\$271,710.84		
CitySmart	650.69	3,574,163	\$144,364.41		
Total	6,196.28	31,760,192	\$1,266,294.46		

The Commercial Solutions MTP program has two subprograms that contribute to the overall savings of the program: the Midstream program and Continuous Energy Improvement (CEI) program. The Midstream program provides ETI customers the ability to purchase LED bulbs and fixtures at a discount from certain distributors. The CEI program is a 3-year behavior-based program that focuses on helping schools, governments, and larger commercial customers reduce their energy use. The savings breakdown for each subprogram are shown below:

2019 Commercial Solutions MTP by Subprogram					
Program	Demand Savings	Energy Savings	Incentive Paid		
Commercial Solutions	3,985.92	23,523,472	\$980,324.30		
Midstream	1,282.77	6,062,034	\$234,972.50		
Continuous Energy Improvement	195.00	1,801,873	\$0.00		
Total 5,463.69 31,387,379 \$1,215,296.8					
2020 Commercia	l Solutions MTP b	y Subprogram			
2020 Commercia Program	l Solutions MTP by Demand Savings	r · · · · ·	Incentive Paid		
		i i			
Program	Demand Savings	Energy Savings 20,328,869	\$960,446.96		
Program Commercial Solutions	Demand Savings 4,153.81	Energy Savings 20,328,869 6,198,380	\$960,446.96 \$305,847.50		

The Commercial Solutions MTP program savings and incentives are a mix of prescriptive and custom measures. The prescriptive measures are calculated using the Technical Reference Manual (TRM) calculations and the custom measures are calculated using Measurement & Verification (M&V) reports. The custom projects include a handful of capital upgrade projects and the CEI program. The breakdown between prescriptive and custom savings and incentives are shown below:

52067 TH42 007

Question No.: CITIES 1-5

2019 Commercial Solutions MTP by Measure				
Program	Demand Savings	Energy Savings	Incentive Paid	
Prescriptive	5,042.26	27,868,551	\$1,143,916.16	
Custom	421.43	3,518,828	\$71,380.64	
Total	5,463.69	31,387,379	\$1,215,296.80	
2020 Commercial Solutions MTP by Measure				
Program	Demand Savings	Energy Savings	Incentive Paid	
Prescriptive	5,504.03	25,729,081	\$1,238,036.08	
Custom	692.26	6,031,111	\$28,258.38	
Total	6,196.28	31,760,192	\$1,266,294.46	

52067 TH43 008

Response of: Entergy Texas, Inc. to the First Set of Data Requests of Requesting Party: CITIES

Prepared By: Mark Delavan Sponsoring Witness: John K. Carson Beginning Sequence No. TH44 Ending Sequence No. TH45

Question No.: CITIES 1-6

Part No.:

Addendum:

Ouestion:

Refer to the Direct Testimony of John K. Carson, Exhibit JKC-1, page 7. Regarding the Commercial Solutions MTP, please provide the proposed program incentives and projected demand and energy savings in 2021 and 2022 for each of the following components of the program:

- Commercial Solutions a.
- **SCORE** b.
- City Smart c.
- d. Prescriptive and custom measures
- Midstream point-of-sale lighting. e.

Response:

Please refer to the Company's response to Cities 1-5 for a description of the customer types shown below that participate in the Commercial Solutions MTP program. The proposed program incentives and projected demand and energy savings for 2021 and 2022 are shown below:

2021 Commercial Solutions MTP by Customer Type				
Program	Demand Savings	Energy Savings	Incentive Paid	
Commercial Solutions	2,625.00	10,119,200	\$809,031.60	
SCORE	750.00	3,113,600	\$248,932.80	
CitySmart	375.00	2,335,200	\$186,699.60	
Total	3,750.00	15,568,000	\$1,244,664.00	

009 52067 **TH44**

Question No.: CITIES 1-6

2022 Commercial Solutions MTP by Customer Type				
Program	Demand Savings	Energy Savings	Incentive Paid	
Commercial Solutions	3,287.90	11,910,469	\$812,500.00	
SCORE	939.40	3,664,760	\$250,000.00	
CitySmart	469.70	2,748,570	\$187,500.00	
Total	4,697.00	18,323,798	\$1,250,000.00	

2021 Commercial Solutions MTP by Subprogram				
Program	Demand Savings	Energy Savings	Incentive Paid	
Commercial Solutions	2,512.50	10,586,240	\$934,664.00	
Midstream	862.50	3,424,960	\$310,000.00	
Continuous Energy Improvement	375.00	1,556,800	\$0.00	
Total	3,750.00	15,568,000	\$1,244,664.00	
2022 Commercia	l Solutions MTP by	y Subprogram		
Program	Demand Savings	Energy Savings	Incentive Paid	
Commercial Solutions	3,146.99	12,460,183	\$890,000.00	
Midstream	1,080.31	4,031,236	\$310,000.00	
Continuous Energy Improvement	469.70	1,832,380	\$50,000.00	
Total	4,697.00	18,323,798	\$1,250,000.00	

2021 Commercial Solutions MTP by Measure				
Program	Demand Savings	Energy Savings	Incentive Paid	
Prescriptive	3,395.90	13,217,194	\$1,182,430.80	
Custom	354.10	2,350,806	\$62,233.20	
Total	3,750.00	15,568,000	\$1,244,664.00	
2022 Commercial Solutions MTP by Measure				
202	2 Commercial Solu	itions MTP by M	easure	
202 Program	2 Commercial Solu Demand Savings			
		Energy Savings	Incentive Paid	
Program	Demand Savings	Energy Savings	Incentive Paid	

52067 TH45 010

Response of: Entergy Texas, Inc. to the First Set of Data Requests of Requesting Party: CITIES

Prepared By: Mark Delavan Sponsoring Witness: John K. Carson Beginning Sequence No. TH46

Ending Sequence No. TH46

Question No.: CITIES 1-7

Part No.:

Addendum:

Question:

For each of the Commercial Solutions MTP components referenced in questions 3 and 4, please provide the source for the demand and energy savings.

Response:

ETI responds to this request pursuant to clarification provided by counsel for Cities that this request was intended to refer to Cities 1-5 and 1-6.

The source of the data for the Commercial Solutions MTP is ETI's P3 database software, which archives completed project data. A breakdown of the subprogram, prescriptive, and customer data and can be found in Exhibit JKC-08 to the Direct Testimony of John K. Carson for 2019 and 2020. A two-year average was used to provide guidance for the projected incentives and savings for 2021 and 2022.

Response of: Entergy Texas, Inc. to the First Set of Data Requests of Requesting Party: CITIES

Prepared By: John K. Carson Sponsoring Witness: John K. Carson

Beginning Sequence No. SS1 Ending Sequence No. SS1

Question No.: CITIES 1-8

Part No.:

Addendum:

Question:

Refer to the Direct Testimony of John K. Carson, Exhibit JKC-1, page 21. Please explain when ETI expects the energy efficiency database project to be completed. Please provide the expenditures incurred by year by component and projected to be incurred by year on this project.

Response:

The energy efficiency database is complete; however, it is continually updated in order to reflect modifications to the Technical Resource Manual (TRM), updated energy codes, weather data, new energy efficiency measures, updates to existing energy efficiency measures, and new studies adopted by Tetra Tech that require alterations to the utilities' programs each year. ETI has a contract with Frontier Energy to update and maintain that database. In Project No. 47115, at Staff's request, ETI agreed to charge 80% of the costs associated with the database to Administrative costs and 20% to Research and Development costs on an annual basis. The total annual cost to maintain the database is approximately \$140,000 pursuant to ETI's contract with Frontier Energy.

52067 SS1 012

Response of: Entergy Texas, Inc. to the First Set of Data Requests of Requesting Party: CITIES

Prepared By: Mark Delavan Sponsoring Witness: John K. Carson

Beginning Sequence No. SS2 Ending Sequence No. SS2

Question No.: CITIES 1-9

Part No.:

Addendum:

Question:

Refer to the Direct Testimony of John K. Carson, Exhibit JKC-1 at page 13. Regarding footnote 3 to Table 4, please describe and provide an explanation for the corrections made to the data from 2015 - 2018.

Response:

In the course of updating ETI's 2019 energy efficiency goal, the Company identified a discrepancy between Table 4 and the weather adjusted data for years 2014 to 2018. To correct this discrepancy, ETI updated Table 4 in its 2020 Energy Efficiency Plan and Report to reflect the weather adjusted data for years 2015 through 2018. The update to Table 4 did not impact ETI's savings goal, as 16 Tex. Admin. Code § 25.181(e)(1)(D) provides that "a utility's goal shall not be lower than its goal in prior years."

52067 SS2 013

Response of: Entergy Texas, Inc. to the First Set of Data Requests of Requesting Party: CITIES

Prepared By: Mark Delavan Sponsoring Witness: John K. Carson

Beginning Sequence No. SS3 Ending Sequence No. SS4

Question No.: CITIES 1-10

Part No.:

Addendum:

Question:

Refer to the Direct Testimony of John K. Carson, Exhibit JKC-1 at page 15, Table 6 and page 18, Table 9. ETI is requesting to increase its 2021 incentive payments (excluding R&D) by \$342k compared to its 2019 actual expenditures. Please provide a detailed description by program of the reasons for the proposed increase.

Response:

When R&D is excluded, the incentive budgets for 2021 are the same as the incentive budgets for 2018, 2019, and 2020. ETI's 2019 actual expenditures were lower than this budgeted amount, as shown in the table below, which shows how each program fared when comparing their incentive budget to the incentives paid in 2019.

2019 Programs	Incentive Difference - Budget Vs.	Percentage within
	Paid	Budget
Commercial Solutions	\$64,724	98%
MTP		
Load Management SOP	\$147,930	61%
Residential SOP	\$75,968	96%
Residential Solutions	\$40,317	96%
MTP		
Hard-To-Reach SOP	\$12,764	99%
Total	\$341,702	95%

ETI is requesting the same incentive budgets as in past years for two reasons. First, ETI is proposing to set up an online marketplace, which would provide another channel by which to offer energy efficiency measures directly to its customers. The online marketplace would allow ETI customers to purchase items like SMART thermostats, SMART power strips, higher efficiency LED light bulbs, and other measures at a competitive price without having to go to a physical store. The online marketplace would also give more access to the energy efficiency measures that have not been offered by ETI's standard offer program contractors. This online marketplace is being offered successfully by other Entergy operating companies, which will likely reduce the initial start-up costs for Texas. Second, the Consumption Study provided by Tetra Tech (Texas'

52067 SS3 014

Question No.: CITIES 1-10

energy efficiency program evaluator) reduced the savings generated by many of the measures being installed in residential homes with gas heating such that many contractors are turning down work in these gas-heated homes. Allowing more of ETI's residential customers the opportunity to purchase energy efficient measures online that are not typically offered by ETI's energy efficiency program contractors enables these customers to continue to reduce their demand and energy consumption. Diversification of ETI's delivery channels for its energy efficiency program measures is essential to continue the success of these programs.

52067 SS4 015

Response of: Entergy Texas, Inc. to the First Set of Data Requests of Requesting Party: CITIES

Prepared By: John K. Carson Sponsoring Witness: John K. Carson

Beginning Sequence No. Ending Sequence No.

Question No.: CITIES 1-11

Part No.:

Addendum:

Question:

Refer to the Direct Testimony of John K. Carson, Exhibit JKC-1 at page 15, Table 6 and page 18, Table 9. ETI is requesting to increase its 2022 incentive payments (excluding R&D) by \$532k compared to its 2019 actual expenditures. Please provide a detailed description by program of the reasons for the proposed increase.

Response:

See the Company's response to Cities 1-10. In 2020, Tetra Tech performed a residential consumption study to assess the effectiveness of infiltration and insulation, the two major energy efficiency measures that ETI's contractors install in homes, the majority of which Based on that study, ETI determined that adjustments to its are gas-heated homes. strategy for implementing energy efficiency measures were necessary to achieve ETI's overall savings goals and took the following actions: (1) ETI increased the budget for the residential programs; (2) ETI plans to begin an online marketplace to promote SMART thermostats, SMART power strips, and higher efficiency LED bulbs (measures the current program contractors are not offering). This will deliver savings for the program because customers will be able to acquire these measures directly through the online marketplace instead of through program contractors. Next, ETI added some additional funds to the Residential Solutions MTP to push Energy Star Home compliance, especially in areas that are not committed to the level of efficiency achieved by Energy Star compliance. ETI will also begin working again with the multi-family homeowners who were dormant last year due to COVID-19 to encourage them to return to the program. Many such homeowners had work done in the Residential SOP previously, and ETI is working with them currently to upgrade their air conditioning systems to higher efficiencies than are currently being installed. ETI also increased the Commercial Solutions Market Transformation Program budget because some of the projects that were committed to be completed by end of the year in 2020 were not completed due to shortages in labor and materials resulting from the COVID-19 pandemic. These projects were rolled over to 2021 for completion.

52067 SS5 016

Response of: Entergy Texas, Inc. to the First Set of Data Requests of Requesting Party: CITIES

Prepared By: John K. Carson Sponsoring Witness: John K. Carson Beginning Sequence No. SS6

Ending Sequence No. SS6

Question No.: CITIES 1-12

Part No.:

Addendum:

Question:

Refer to the Direct Testimony of John K. Carson, Exhibit JKC-1 at page 17, Table 8. Please explain the reasons that in 2019, the reported and verified demand savings were 36% greater than projected and the reported and verified energy savings were 63% greater than projected.

Response:

The reported and verified demand and energy savings were greater because many of the projects that participated in the program installed measures that achieved higher savings than anticipated at the time that the program budget was created.

52067 SS6 017

Response of: Entergy Texas, Inc. to the First Set of Data Requests of Requesting Party: CITIES

Prepared By: John K. Carson Sponsoring Witness: John K. Carson

Beginning Sequence No. SS7 Ending Sequence No. SS7

Question No.: CITIES 1-13

Part No.:

Addendum:

Question:

Refer to the Direct Testimony of John K. Carson, Exhibit JKC-1 at page 17, Table 8. Please explain the reasons that in 2020, the reported and verified demand savings were 29% greater than projected and the reported and verified energy savings were 65% greater than projected.

Response:

See the Company's response to Cities 1-12.

52067 SS7 018

Response of: Entergy Texas, Inc. to the First Set of Data Requests

of Requesting Party: CITIES

Prepared By: Mark Delavan

Sponsoring Witness: John K. Carson

Beginning Sequence No. SS8 Ending Sequence No. SS8

Question No.: CITIES 1-14

Part No.:

Addendum:

Question:

Refer to the Direct Testimony of John K. Carson, Exhibit JKC-10. Please provide a description of each of the listed project codes: F3PCR56902, F3PCR56903, F3PCR56904, F3PCR56905, F3PCR56906, and F3PCR56917.

Response:

Please refer to table below:

Project Code	Description
F3PCR56902	Administrative Costs
F3PCR56903	Residential SOP costs
F3PCR56904	Hard-to-Reach SOP costs
F3PCR56905	Commercial Solutions MTP costs
F3PCR56906	Residential Solutions MTP costs
F3PCR56917	Load Management SOP costs

52067 SS8 019

Response of: Entergy Texas, Inc. to the First Set of Data Requests of Requesting Party: CITIES

Prepared By: J. Andrew Lewis, Jr. Sponsoring Witness: J. Andrew Lewis, Jr.

Beginning Sequence No. SS9 Ending Sequence No. SS9

Question No.: CITIES 1-15 Part No.:

Addendum:

Question:

Refer to the Direct Testimony of Jay A. Lewis, Exhibit JAL-1, page 6. Please provide the annual billing determinants by rate class for the years 2018 through 2022 without the Large General Service opt-out amounts removed. Also provide separately the amount of Large General Service opt-out amounts by year for 2018 through 2022.

Response:

Please see the attached.

52067 CITIES SS9 020

Billing Determinants by Class		Opt Outs	Excluding Opt Outs (Agre
Residential	6,153,603,124		6,153,603,124
Small General Service	404,472,844		404,472,844
General Service	3,247,028,870		3,247,028,870
Large General Service	1,379,879,771	77,086,388	1,302,793,383
Large Industrial Power Service	8,593,293,245	7,892,862,122	700,431,124
Lighting	92,409,785		92,409,785
Total	19,870,687,640	7,969,948,510	11,900,739,130

Large Industrial Power Service In	ndustrial Transmission Voltage Levels
230 KV	3,341,152,885
69/138 KV	4,551,709,237
Total	7 892 862 122

Large General Service Opt out customers
69/138 KV 77,086,388

Amounts may not add or agree with other schedules due to rounding.

Billing Determinants by Class		Opt Outs	Excluding Opt Outs (Agre
Residential	6,029,646,207		6,029,646,207
Small General Service	416,924,778		416,924,778
General Service	3,345,550,003		3,345,550,003
Large General Service	1,419,742,478	82,645,297	1,337,097,180
Large Industrial Power Service	8,595,930,999	8,103,845,919	492,085,080
Lighting	93,932,113		93,932,113
Total	19,901,726,578	8,186,491,216	11,715,235,362

230 KV 3,099,273,379 5,004,572,540 8,103,845,919 69/138 KV Total

Large General Service Opt out customers 69/138 KV

82,645,297

Amounts may not add or agree with other schedules due to rounding

Billing Determinants by Class		Opt Outs	Excluding Opt Outs (Agre-
Residential	6,038,573,050		6,038,573,050
Small General Service	344,162,584		344,162,584
General Service	3,559,029,403		3,559,029,403
Large General Service	1,497,010,021	47,361,405	1,449,648,616
Large Industrial Power Service	8,234,388,712	7,755,929,404	478,459,308
Lighting	98,411,328		98,411,328
Total	19,771,575,099	7,803,290,809	11,968,284,290

Large Industrial Power	Service Industrial Transmission Voltage Levels
230 KV	2,907,624,897
69/138 KV	4,848,304,507
Total	7,755,929,404

Large General Service Opt out customers
69/138 KV 47,361,405

Amounts may not add or agree with other schedules due to rounding

Billing Determinants by Class		Opt Outs	Excluding Opt Outs (Agre
Residential	6,018,430,108		6,018,430,108
Small General Service	335,123,018		335,123,018
General Service	3,460,129,655		3,460,129,655
Large General Service	1,440,753,784	12,695,214	1,428,058,570
Large Industrial Power Service	7,511,036,355	7,063,894,085	447,142,270
Lighting	97,241,926		97,241,926
Total	18,862,714,847	7,076,589,299	11,786,125,547

Large Industrial Power	Service Industrial	Transmission \	/oltage Levels
230 KV		2,776,969,4	67

4,286,924,618 7,063,894,085 69/138 KV Total

Large General Service Opt out customers 69/138 KV

12,695,214

Amounts may not add or agree with other schedules due to rounding.

Billing Determinants by Class - Include	les opt outs	Opt Outs	Excluding Opt Outs (Agre
Residential	5,878,747,497		5,878,747,497
Small General Service	333,283,950		333,283,950
General Service	3,438,810,162		3,438,810,162
Large General Service	1,412,267,339	5,644,212	1,406,623,127
Large Industrial Power Service	7,308,586,046	6,889,431,626	419,154,420
Lighting	97,803,179		97,803,179
Total	18,469,498,173	6,895,075,838	11,574,422,335

Large Industrial Power Service Indus	trial Transmission Voltage Levels
230 KV	2,061,575,611
69/138 KV	4,827,856,015
Total	6,889,431,626

Large General Service Opt out customers
69/138 KV 5,644,212

Amounts may not add or agree with other schedules due to rounding